

THE GEORGE  
WASHINGTON  
UNIVERSITY  
WASHINGTON, DC

Andrew Mabon  
Paralegal  
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January 10, 2020

**VIA EMAIL/CERTIFIED MAIL**

Sylvie Jill Levine  
Federal Defenders of New York  
52 Duane Street, 10th Floor  
New York, NY 10007

Re: *United States v. Michael Avenatti*  
[1:19-cr-00373-PGG]

Dear Sylvie,

The George Washington University ("GW") has been served with a subpoena, a copy of which is attached, for production of education records relating to Michael Avenatti (the "Records").

Please be advised that, pursuant to the Family Educational Rights and Privacy Act of 1974 ("FERPA"), GW is notifying you about this subpoena so you may seek protection from the court to prevent disclosure if you so choose.

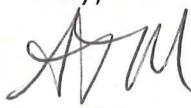
Accordingly, if you do not object to the release of the Records pursuant to the subpoena, then you do not need to do anything.

However, if you do object to the release of the Records, then you must file a written objection with the court to prevent disclosure. You must also send a copy of your written objection to me.

If I have not received an objection from you by Friday, January 17, 2020, we will assume that you do not intend to seek protection from the court and proceed to respond to the subpoena as required by law.

Thank you for your attention to this matter.

Sincerely,



Andrew Mabon  
Paralegal

/enclosures/

Court Subpoena

United States District Court  
SOUTHERN DISTRICT OF NEW YORK

TO: George Washington University  
Office of General Counsel  
2000 Pennsylvania Avenue NW  
Suite 305  
Washington, DC 20006

GREETINGS:

WE COMMAND YOU that all and singular business and excuses being laid aside, you appear and attend before the United States District Court for the Southern District of New York, 40 Foley Square, in the Borough of Manhattan, City of New York, New York, in the Southern District of New York, at the following date, time and place:

Appearance Date: January 21, 2020

Appearance Time: 9:00 a.m.

Appearance Place: Courtroom 705

to testify and give evidence in the following matter:

United States v. Michael Avenatti, 19 Cr. 373 (PGG)

and not to depart the Court without leave thereof, or of the United States Attorney.

**PLEASE SEE ATTACHED RIDER.**

Failure to attend and produce any items hereby demanded will constitute contempt of court and will subject you to civil sanctions and criminal penalties, in addition to other penalties of the Law.

DATED: New York, New York  
January 9, 2020

Geoffrey S. Berman /RBS  
GEOFFREY S. BERMAN  
United States Attorney for the  
Southern District of New York

*Robert B. Sobelman*

Robert B. Sobelman/Matthew Podolsky  
Assistant United States Attorneys  
One St. Andrew's Plaza  
New York, New York 10007  
[REDACTED]



RIDER

(Trial Subpoena to George Washington University dated January 9, 2020)  
Ref. No. 19 Cr. 373 (PGG)

Provide all transcripts or other documents sufficient to show completed coursework at the George Washington University Law School for Michael Avenatti, [REDACTED].

Declaration of Custodian of Records

Pursuant to 28 U.S.C. § 1746, I, the undersigned, hereby declare:

My name is \_\_\_\_\_  
(name of declarant)

I am a United States citizen and I am over eighteen years of age. I am the custodian of records of the business named below, or I am otherwise qualified as a result of my position with the business named below to make this declaration.

I am in receipt of a Trial Subpoena, dated January 9, 2020, and signed by Assistant United States Attorney Robert B. Sobelman, requesting specified records of the business named below. Pursuant to Rules 902(11) and 803(6) of the Federal Rules of Evidence, I hereby certify that the records provided herewith and in response to the Subpoena:

- (1) were made at or near the time of the occurrence of the matters set forth in the records, by, or from information transmitted by, a person with knowledge of those matters;
- (2) were kept in the course of regularly conducted business activity; and
- (3) were made by the regularly conducted business activity as a regular practice.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on \_\_\_\_\_.  
(date)

\_\_\_\_\_  
(signature of declarant)

\_\_\_\_\_  
(name and title of declarant)

\_\_\_\_\_  
(name of business)

\_\_\_\_\_  
(business address)

Definitions of terms used above:

As defined in Fed. R. Evid. 803(6), "record" includes a memorandum, report, record, or data compilation, in any form, of acts, events, conditions, opinions, or diagnoses. The term, "business" as used in Fed. R. Evid. 803(6) and the above declaration includes business, institution, association, profession, occupation, and calling of every kind, whether or not conducted for profit.